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6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 MICHAEL JONES,

12 Defendant.

13 Case No. 2:15-cr-00174-KJD-BNW  
2:18-cr-00023-KJD-BNW

14 **STIPULATION AND ORDER TO**  
**CONTINUE SENTENCING**

15 IT IS HEREBY STIPULATED AND AGREED by and between defendant,  
16 MICHAEL JONES, by and through his counsel, Chris T. Rasmussen, Esq., and the United  
17 States of America, by and through Jason M. Frierson, Acting United States Attorney, and  
18 Daniel J. Cowhig, Assistant United States Attorney, that the above-captioned matter currently  
19 scheduled for sentencing on November 29, 2022, at 10:00 a.m. be vacated and continued for  
20 seventy days or for a time suitable to the court. This Stipulation is entered into for the  
21 following reasons:

- 22 1. The parties agree to a continuance;  
23 2. Defendant is currently out of custody;  
24 3. Counsel for the Defendant has spoken to the Defendant and the Defendant has no  
25 objection to this continuance;

1       4. Counsel for Defendant is preparing for a lengthy sentencing the same week that  
2 involves a large loss amount that is disputed and involves two separate cases for the same  
3 defendant. (United States v. King Umoren, 16-cr-374, 19-cr-64). Additionally, counsel for  
4 Jones has a preliminary hearing on a murder case. (State of Nevada vs. Vargas) on the same  
5 day.

6       5. Counsel for Defendant needs additional time to adequately prepare for sentencing;

7       6. Denial of this request could result in a miscarriage of justice;

8       7. For all the above- stated reasons, the ends of justice would best be served by a  
9 continuance of the sentencing date by seventy days.

10      8. This is the eleventh request for continuance.

11      DATED this 8<sup>th</sup> day of November, 2022.

13      /s/ Chris T. Rasmussen

14      /s/ Daniel J. Cowhig

15      CHRIS T. RASMUSSEN, ESQ.  
Attorney for Defendant

16      \_\_\_\_\_  
DANIEL J. COWHIG  
Assistant United States Attorney

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

MICHAEL JONES,

**Defendant.**

Case No.: 2:15-cr-00174-KJD-BNW  
2:18-cr-00023-KJD-BNW

## **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

## **FINDINGS OF FACT**

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. The parties agree to a continuance;
  2. Defendant is currently out of custody;
  3. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to this continuance.
  4. Counsel for Defendant is preparing for a lengthy sentencing the same week that involves a large loss amount that is disputed and involves two separate cases for the same defendant. (United States v. King Umoren, 16-cr-374, 19-cr-64). Additionally, counsel for defendant has a preliminary hearing on a murder case. (State of Nevada vs. Vargas) on the same day.
  5. Counsel for Defendant needs additional time to adequately prepare for sentencing;

- 1       6. Denial of this request could result in a miscarriage of justice;  
2       7. For all the above- stated reasons, the ends of justice would best be served by a  
3 continuance of the sentencing date by seventy days.

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5                   **CONCLUSIONS OF LAW**

- 6       1. Denial of this request would result in a miscarriage of justice;  
7       2. For all the above-stated reason, the ends of justice would best be served by a  
8 continuance of the sentencing date for seventy days.

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
MICHAEL JONES,  
Defendant.

Case No.: 2:15-cr-00174-KJD-BNW  
2:18-cr-00023-KJD-BNW

## ORDER

Accordingly, IT IS SO ORDERED that the sentencing currently scheduled for November 29, 2022 at the hour of 10:00 a.m., be vacated and continued to January 31, 2023, at the hour of 11:00 a.m. in courtroom 4A.

DATED this 15th day of November, 2022.

  
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UNITED STATES DISTRICT JUDGE